

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FERROSTAAL METALS GROUP, INC.,
formerly known as MAN FERROSTAAL,
INC.

Plaintiffs, 08 CV 0457 (JSR) (DFE)

- against -

M/V GLOBAL OCEAN, her engines,
boilers, tackle, etc., GLOBAL
ANGEL SA, UNITED OCEAN SHIP
MANAGEMENT, WESTERN BULK
CARRIERS AS, WESTERN BULK
CARRIERS KS,

ANSWER TO CROSS-CLAIM
WITH AFFIRMATIVE
DEFENSES

Defendants.

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Defendants WESTERN BULK CARRIERS AS and WESTERN BULK
CARRIERS KS (collectively "answering defendants") answer the
Cross-Claim of defendant GLOBAL ANGEL SA upon information and
belief as follows:

FIRST: Answering defendants deny knowledge or
information sufficient to form a belief as to the allegations
contained in paragraphs "30" and "31" of defendant GLOBAL ANGEL
SA'S Cross-Claim.

SECOND: Answering defendants deny each and every
allegation contained in paragraphs "32", "33" and "34" of
defendant GLOBAL ANGEL SA'S Cross-Claim.

AS AND FOR A FIRST SEPARATE AND COMPLETE AFFIRMATIVE DEFENSE


THIRD: Answering defendants repeat, reiterate and make applicable to defendant GLOBAL ANGEL SA'S Cross Claim each Separate and Complete Affirmative defense in their Answer to plaintiff's Complaint as if specifically set forth herein at length.

WHEREFORE, Answering defendants demand judgment dismissing the Cross-Claim, and awarding to answering defendants costs, fees, including reasonable attorneys' fees and disbursements of this action, and further demand judgment for such other and further relief the Court may deem just and proper.

Dated: New York, N.Y.
April 25, 2008

MAHONEY & KEANE, LLP
Attorneys for Defendant
WESTERN BULK CARRIERS AS and
WESTERN BULK CARRIERS KS

By:



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